



Oct 8 1998

AMERICAN BANKERS ASSOCIATION
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036

NATIONAL BANKPAC COMMITTEE

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Chairman of the Board and CEO
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October 8, 1998

Mr. F. Andrew Turley
Supervisory Attorney
Central Enforcement Docket
Federal Election Commission
999 E Street, N.W.
Washington D.C. 20463

RE: MUR 4814

Dear Mr. Turley:

This letter is in response to your letter of September 30, 1998.

Your letter forwarded a complaint which includes two matters involving the American Bankers Association (ABA) BankPac. The first issue involves a \$4000 contribution which "Friends of Jim Maloney" campaign committee apparently received on September 1, 1998. The list attached to the complaint indicates that this check was a Primary Election contribution, however this contribution was issued by ABA BankPac on August 27, 1998 and the check was clearly marked as a General Election contribution. For your convenience, I have enclosed a copy of the canceled check received from Crestar Bank. As this check was properly made to the General Election of "Friends of Jim Maloney" campaign committee, it does not require re-designation as was suggested in the complainant's letter.

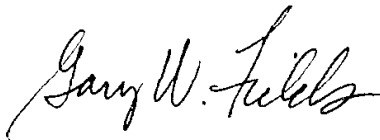
The second matter involves the total amount contributed by BankPac to the General Election of "Friends of Jim Maloney" campaign committee. Two \$1000 campaign contributions were made by checks issued on June 17 and June 26, 1998. A \$4000 contribution was made by a check issued on August 27, 1998, bringing the total BankPac contributions to the General Election of "Friends of Jim Maloney" campaign committee to \$6000, which is \$1000 more than the \$5,000 maximum allowed. This situation arose because the June 17 check, which was intended to be a contribution to the Primary Election, was inadvertently marked as a General Election contribution.

As it is too late to re-designate the June 17 contribution as a Primary Election contribution, I have written the attached letter to Ms. Meg Tansey, Finance Director, "Friends of Jim Maloney" campaign committee asking for a refund of \$1000 to ABA BankPac.

I believe that the discussion above addresses all of the matters in the complaint which involve ABA BankPac. It is my understanding that when the refund is received and reported to the Federal Election Commission, ABA BankPac will be in compliance with the Federal Election Campaign Act of 1971 and no further action by ABA BankPac will be necessary on this complaint.

Please feel free to contact me if you have any questions or if I can be of any further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Gary W. Fields". The signature is fluid and stylized, with the first and last names being more prominent than the middle initial.

Gary W. Fields

6692

AMERICAN BANKERS ASSOCIATION

QUALIFIED MULTI-CANDIDATE COMMITTEE

1120 CONNECTICUT AVE., N.W.

WASHINGTON, D.C. 20036

15-52
540

Pay to the
order of

Maloney for Congress

August 27, 19 98

\$*4,000.00*

****Four Thousand Dollars

XX/100

Dollars

CRESTAR

Crestar Bank
Washington, DC

D/05/CT 98' General

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TOTONA NJ

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DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
BE SURE TO PRINT FULL INSTITUTION NAME *

PAY TO THE ORDER OF
FIRST UNION BANK
054001220
FOR DEPOSIT ONLY
FRIENDS OF JIM MALONEY
203000077852

* FEDERAL RESERVE BOARD OF GOVERNORS REG. CC

FUMB 09/02/98
RICHMOND VA
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